IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

)	
UNITED STATES OF AMERICA)	Criminal No. 1:19cr59
)	
v.)	The Honorable Liam O'Grady
)	
DANIEL EVERETTE HALE,)	
)	
Defendant.)	
)	

MOTION TO SET DATE FOR DELIVERY OF GRAND JURY TRANSCRIPTS FOR *IN CAMERA* REVIEW

On November 15, 2019, the Court held a hearing on several motions filed by the parties.

One of the motions argued at the hearing was Defendant Daniel Hale's Motion for Production of Grand Jury Materials, which sought disclosure of:

all relevant grand jury materials with respect to Count One of the Superseding Indictment. . . . [including], . . . the grand jury instructions with respect to Count One, any explanation or argument regarding the substance of Count One by the government to the grand jury, and/or any grand jury questions (and the corresponding answers) relating to the substance of Count One.

(Def.'s Mot. at 9, Dkt. 84.) The Court took the motion under advisement, and ordered the United States to provide the relevant grand jury transcripts for *in camera* review.

As stated at the hearing, the portions of the grand jury proceedings pertinent to the defendant's motion have not been transcribed yet. The government requested transcriptions today, and was advised that they will be delivered to the government no later than December 2, 2019. Because the transcripts will concern matters beyond Count One, the government requests

one week to review the transcripts and make appropriate redactions. The government thus proposes December 9, 2019, as the date by which the relevant transcripts should be delivered to the Court for *in camera* review.

Respectfully submitted,

G. Zachary Terwilliger United States Attorney

By: /s/

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CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2019, I electronically filed the foregoing Motion with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to counsel of record.

/s/

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